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13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION**

18 **-and-**

19 **PACIFIC GAS AND ELECTRIC
COMPANY,**

20 **Debtors**

21

22 Affects PG&E Corporation

23 Affects Pacific Gas and Electric Company

24 Affects both Debtors

25

26 *All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

27

28 **DECLARATION OF STEVEN M.
CAMPORA IN SUPPORT OF MOTION
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS FOR RELIEF
FROM AUTOMATIC TO PERMIT
STATE COURT JURY TRIAL OF 2017
TUBBS WILDFIRE CLAIMS**

Date: July 23, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Steven M. Campora, declare the following under penalty of perjury pursuant to 28 USC
2 section 1746:

3 1. I have personal knowledge of the facts set forth in this declaration.
4 2. I am a member of the State Bar of California and a partner with the law firm of
5 Dreyer Babich Buccola Wood Campora LLP (“**Law Firm**”).

6 3. In September 2015, a wildfire ignited and spread in Amador and Calaveras Counties
7 in Northern California that CalFire reported destroyed 549 homes, and other outbuildings and
8 commercial properties (the “**2015 Butte Fire**”).

9 4. Hundreds of individuals sued Pacific Gas & Electric Company (“**PG&E**”) in the
10 Superior Court of California for the Counties of Calaveras and San Francisco, for damages and
11 losses they suffered as a result of the loss of their residences, property, and personal injuries they
12 alleged were caused by PG&E’s contribution to the ignition of 2015 Butte Fire (“**2015 Butte Fire**
13 **Litigation**”). Those cases became the Butte Fire JCCP venued in Sacramento, California.

14 5. My firm and I, together with three other firms, represented approximately 1200
15 individuals in the 2015 Butte Fire Litigation. I am a Liaison Counsel in the JCCP action and I led
16 most of the discovery on behalf of the individual Plaintiffs.

17 6. Every one of our clients alleged substantial damage claims against PG&E with
18 respect to the property damage, economic losses, loss of use and enjoyment, and/or emotional
19 distress damages suffered as a result of PG&E’s actions or inactions that contributed to the 2015
20 Butte Fire.

21 7. The Law Firm and I did not represent any clients with claims against PG&E for only
22 smoke damage.

23 8. PG&E litigated my clients’ claims in the Butte Fire Litigation through discovery of
24 the documents that supported their claims and written discovery. I am also aware that PG&E
25 deposed numerous individual plaintiffs as their cases neared trial.

26 9. As part of my representation, I was involved in opposing writs filed by PG&E with
27 the Third District Court of Appeal and requests for relief in the California Supreme Court.

1 10. I requested a trial by jury for some of our clients' claims against PG&E in the 2015
2 Butte Fire Litigation. However, the claims of my clients were ultimately settled short of trial.

3 11. Some of my clients' cases were settled on the eve of trial.

4 12. PG&E never actually tried any of my clients' cases and I am unaware of PG&E
5 taking any case, arising from the Butte Fire, to trial.

6 13. The 2015 Butte Fire Litigation and settlement process had been ongoing for
7 approximately three years at the time PG&E filed for bankruptcy protection. There are some Butte
8 Fire victims whose cases have not been resolved.

9 I declare under penalty of perjury that the foregoing is true and correct.

10 Executed on June 24th , 2019 at Sacramento, California.

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